

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-CR-20025-KMW

UNITED STATES OF AMERICA

v.

LUKE WILSON,
a/k/a "Jimmy Cash,"
a/k/a "Ethan Sullivan,"

Defendant.

FACTUAL PROFFER

The United States and the Defendant, Luke Wilson (the "Defendant"), stipulate that if this case were to proceed to trial, the United States would prove the following facts, among others, beyond a reasonable doubt:

On or about January 10, 2024, a United States Coast Guard vessel encountered the Defendant on board a vessel traveling from the Bahamas to the United States. After observing individuals depart the vessel near the shore of Surfside, Florida, law enforcement interdicted the vessel. The Defendant waived his *Miranda* rights and spoke with law enforcement. In that audio-recorded interview, the Defendant told law enforcement that he paid an individual in the Bahamas \$4,000 to travel to the United States by boat and his intention was to remain in the United States. He also admitted that upon the vessel's approach to the shore, he slipped and was unable to jump out of the boat before it began traveling back to the Bahamas.

Law enforcement conducted records checks that revealed the Defendant was a national of the United Kingdom who was previously removed from the United States on or about March 3, 2020. The Defendant did not have the consent of the Attorney General of the United States or his

successor, the Secretary of Homeland Security, to apply for readmission into the United States on or about January 10, 2024.

The United States and the Defendant agree that these facts, which do not include all of the facts known to the United States and to the Defendant, are sufficient to prove the guilt of the Defendant as to the crime of Reentry of a Removed Alien, in violation of Title 8, United States Code, Section 1326(a).

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

Date:

2/14/2024

By:



AUDREY PENCE TOMANELLI
ASSISTANT UNITED STATES ATTORNEY

Date:

2/14/2024

By:

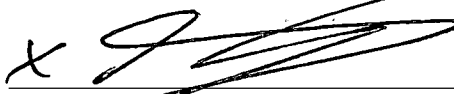


DAVID EDELSTEIN
ATTORNEY FOR DEFENDANT

Date:

2/14/2024

By:



LUKE WILSON
DEFENDANT